

EXHIBIT 3

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*Counsel for Individual and Representative Plaintiffs
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[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, Sarah Silverman, Christopher
Golden, Michael Chabon, Ta-Nehisi Coates, Junot
Díaz, Andrew Sean Greer, David Henry Hwang,
Matthew Klam, Laura Lippman, Rachel Louise
Snyder, Ayelet Waldman, and Jacqueline Woodson,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc., a Delaware corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' FIRST SET OF
REQUESTS FOR PRODUCTION TO
DEFENDANT META**

1 In accordance with Federal Rules of Civil Procedure Rules 26 and 34, Plaintiffs, by and through
2 their undersigned attorneys, hereby request that Defendant Meta produce for inspection and copying,
3 within thirty days of service, the documents and things described below, in accordance with the
4 following definitions and instructions. Plaintiffs request that Defendant Meta produce documents and
5 other things described below electronically or at the offices of Joseph Saveri Law Firm, LLP, 601
6 California Street, Suite 1000, San Francisco, California 94108.

8 **DEFINITIONS**

9 As used herein, the following words, terms, and phrases—whether singular or plural, or in an
10 alternate verb tense—shall have the meanings ascribed below. Defined terms may not be capitalized or
11 made uppercase. The given definitions apply even if a term in question is not capitalized or made
12 uppercase. No waiver of a definition is implied by the use of a defined term in a non-capitalized or
13 lowercase form:

14 1. “Agreements” means any oral or written contract, arrangement or understanding,
15 whether formal or informal, between two or more Persons, including all drafts, versions, modifications,
16 amendments, attachments, exhibits, and appendices thereof.

17 2. “All,” “Or,” and “And” should be understood to include and encompass “any”; “or”
18 should be understood to include and encompass “and”; and “and” should be understood to include and
19 encompass “or.”

20 3. “Communications” means oral or written communications of any kind, communicated
21 directly or indirectly, Including, without limitation, inquiries, complaints, discussions, conversations,
22 negotiations, agreements, meetings, interviews, telephone conversations, letters, correspondences,
23 memoranda, notes, telegrams, facsimiles, electronic mail (e-mail) messages and attachments, instant or
24 direct messages (Including SMS messages, text messages, Apple iMessages, Slack messages, Teams
25 messages), memoranda, documents, writings, or other forms of communications. The term
26 “Communications” Includes instances where one party disseminates information that the other party
27 receives but does not respond to.
28

1 association.

2 17. “Relevant Period” includes and encompasses all times relevant to the acts and failures to
3 act which are relevant to the Complaint.

4 18. “RLHF” means “reinforcement learning from human feedback.”

5 19. “Training Data” means textual or other material used, or considered for use, as input to a
6 machine-learning model to achieve or improve its performance during any phase of its development,
7 Including pretraining, training, validation, testing, fine-tuning, and alignment.

8 20. “You” or “Your” refers to and includes the specific Defendant producing documents in
9 response to these Requests, its employees, agents, attorneys, accountants, representatives, predecessors
10 or successors-in-interest, any corporation or partnership under its direction, or any other person or
11 entity acting on its behalf or under its control.

12 INSTRUCTIONS

13
14 1. Please separately respond to each item by stating (a) you will produce, (b) you are
15 presently unable to produce, or (c) you object to production.

16 2. Unless superseded by a mutually-agreed-upon stipulation, the following provisions shall
17 generally govern the production format and procedure for Hard Copy Documents and images:

- 18 a. All Documents originating in hardcopy format will be produced as black-and-
19 white or color (if originally in color), single-page, 300 dpi Group IV tagged
20 image file format (“TIFF”) images, with OCR text and related path provided in
21 document level text files.
- 22 b. In scanning hardcopy documents, distinct documents should not be merged into a
23 single record, and single documents should not be split into multiple records (i.e.,
24 hardcopy documents should be logically unitized). The Producing Party will use
25 reasonable efforts to unitize documents correctly.
- 26 c. Where a document, or a document group – such as folder, clipped bundle, or
27 binder – has an identification spine or other label, the information on the label
28 shall be scanned and produced as the first page of the document or grouping.

REQUEST FOR PRODUCTION NO. 47

All Documents and Communications Concerning the action entitled *Huckabee et al. v. Meta Platforms, Inc.*, Case No. 1:23-cv-09152 (S.D.N.Y), Including any Documents and Communications You produce, or have produced, to any parties (or third-parties) in that action.

REQUEST FOR PRODUCTION NO. 48

All Documents You relied on in responding to Plaintiffs' Interrogatory No. 14, served concurrently herewith.

REQUEST FOR PRODUCTION NO. 49

All Documents and Communications Concerning the decision to release the Meta Language Models under what Meta calls an "open source" license.

REQUEST FOR PRODUCTION NO. 50

All Documents and Communications Concerning any individuals or entities who have been given access to, or denied or limited access from, Llama 1 or Llama 2.

Dated: December 27, 2023

By: /s/ Joseph R. Saveri

Joseph R. Saveri

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

PROOF OF SERVICE

I, the undersigned, am employed by the Joseph Saveri Law Firm, LLP. My business address is 601 California Street, Suite 1000, San Francisco, California 94108. I am over the age of eighteen and not a party to this action.

On December 27, 2023, I caused the following documents to be served by email upon all persons appearing on the attached Service List:

- **PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION TO DEFENDANT META**

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 27, 2023.



Ruby Ponce

SERVICE LIST

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